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# UNITED STATES DISTRICT COURT

## DISTRICT OF NEVADA

VENETIAN CASINO RESORT, LLC, a  
 Nevada limited liability company,

Plaintiff,

v.

ENWAVE LAS VEGAS LLC, a Delaware  
 limited liability company,

Defendant.

ENWAVE LAS VEGAS LLC, a Delaware  
 limited liability company,

Counterclaimant,

v.

VENETIAN CASINO RESORT, LLC, a  
 Nevada limited liability company, and  
 INTERFACE GROUP-NEVADA, INC., a  
 Nevada corporation,

Counterdefendants.

CASE NO.: 2:19-cv-01197-JCM-DJA

**STIPULATION AND [PROPOSED]  
 ORDER FOR AN EXTENSION OF  
 TIME FOR ENWAVE TO RESPOND TO  
 DISCOVERY REQUESTS, FOR THE  
 PARTIES TO RESPOND TO GCS'S  
 AMENDED COUNTERCLAIM, AND  
 FOR VCR AND INTERFACE TO FILE  
 THEIR REPLY IN SUPPORT OF THEIR  
 MOTION TO STRIKE**

**[FIRST REQUEST]**

GRAND CANAL SHOPS II, LLC, a  
 Delaware limited liability company,  
  
 Counterclaimant,  
  
 v.  
  
 VENETIAN CASINO RESORT, LLC, a  
 Nevada limited liability company,  
  
 Counterdefendant.<sup>1</sup>

Defendant/Counterclaimant ENWAVE LAS VEGAS LLC (“Enwave”), by and through its counsel of record the law firm of Brownstein Hyatt Farber Schreck, LLP and Baker Donelson Bearman Caldwell & Berkowitz, PC; Plaintiff/Counter Defendant VENETIAN CASINO RESORT, LLC (“VCR”) and Counter Defendant INTERFACE GROUP-NEVADA, INC. (“Interface”, together with Venetian “the Venetian Parties”), by and through their counsel of record the law firm of Dickinson Wright PLLC and Mintz & Gold, LLP; and Intervenor/Defendant/Counterclaimant GRAND CANAL SHOPS II, LLC (“GSC”), by and through its counsel of record the law firms of King & Spalding LLP and Santoro Whitmire (hereinafter collectively “the Parties”), hereby stipulate and agree pursuant to Local Rule 7-1 and Local Rule IA 6-1 to extend (a) the deadline for Enwave to respond and produce documents in response to the Venetian Parties’ discovery requests (current deadline February 19, 2021), (b) the deadline to file a response to GCS’s Amended Counterclaim (current deadline February 24, 2021), and (c) the deadline for the Venetian Parties to file a Reply in support of the Motion to Strike GCS’s Counterclaim (current deadline February 23, 2021), as follows:

1. On January 11, 2021, GCS filed its Counterclaim against Enwave (ECF No. 68);
2. On January 26, 2021, the Court approved the Parties’ Stipulated Discovery Plan and Scheduling Order, providing for Enwave to respond and produce documents in response to the Venetian Parties’ discovery requests by February 19, 2021 (ECF No. 72);

<sup>1</sup> The Venetian Parties object to the caption as incorrectly listing VCR as the Counter Defendant.

- 1           3.     On February 1, 2021, the Parties filed a Stipulation and Proposed order for
- 2                 Extension of time for Enwave to respond to GCS's Counterclaim (ECF No. 74)
- 3                 ("First Stipulation");
- 4           4.     On February 1, 2021, the Venetian Parties filed a Motion to Strike GCS's
- 5                 Counterclaim and to Revoke GCS's Intervenor Status (ECF No. 75) ("Motion to
- 6                 Strike");
- 7           5.     The Court approved the First Stipulation, providing Enwave until February 11,
- 8                 2021, to respond to GCS's Counterclaim (ECF No. 76);
- 9           6.     On February 10, 2021, GCS filed its Amended Counterclaim (ECF No. 77),
- 10                triggering a response deadline of February 24, 2021;
- 11           7.     On February 16, 2021, GCS filed its Response to the Venetian Parties' Motion to
- 12                Strike;
- 13           8.     The Venetian Parties' current deadline to file a Reply in support of the Motion to
- 14                Strike is February 23, 2021 and the current deadline to file a motion to strike the Amended
- 15                Counterclaim is February 24, 2021;
- 16           9.     Enwave has requested additional time to respond and produce documents in
- 17                response to the Venetian Parties' discovery requests and, as a professional courtesy, the Venetian
- 18                Parties agreed to the same, contingent upon GCS agreeing to an extension of the deadline for the
- 19                Venetian Parties to file the Reply in support of the Motion to Strike and the deadline to file any
- 20                new motion to strike with respect to the Amended Counterclaim, to which GCS has agreed;
- 21           10.    In light of the foregoing extensions, the parties have also agreed to an extension of
- 22                the deadline for Enwave to respond to GCS's Amended Counterclaim; and
- 23           11.    Accordingly, the Parties hereby stipulate, subject to this Court's approval, that the
- 24                deadlines for Enwave to respond and produce documents in response to the Venetian Parties'
- 25                discovery requests and to respond to GCS's Amended Counterclaim are extended to **March 22,**
- 26                **2021**, the deadline for the Venetian Parties to file any motion to strike GCS's Amended
- 27                Counterclaim is extended to **April 13, 2021**; and the deadline for the Venetian Parties to file a
- 28                Reply Brief in support of its Motion to Strike is extended to **April 13, 2021**, and request that the

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Court enter an order providing the same. This is the first request to extend the foregoing deadlines, and the Parties submit that good cause exists for these extensions and that they are not intended for purposes of delay.

DATED: February 23, 2021.

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and Counterdefendant Interface  
Group-Nevada, Inc.*

DATED: February 23, 2021.

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*Attorneys for Intervenor-Defendant/Counter  
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DATED: February 23, 2021.

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Enwave Las Vegas LLC*

**IT IS SO ORDERED:**

DATED February 25, 2021.

  
UNITED STATES MAGISTRATE JUDGE

1 Respectfully submitted by:

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3 BY: /s/ Emily A. Ellis

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